

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

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STIPULATION OF FACTS

Defendant Nancy Hudak (“Hudak”), and Plaintiff Fuchs Lubricants Co. (“Fuchs”), by and through their respective counsel, hereby stipulate and agree to the following facts:

5. On October 1, 2007, Hudak began working for Hangsterfer's Laboratories, Inc. (“Hangsterfer’s,” which is a direct competitor of Fuchs), where she held the position of “Chief Chemist.”

6. During the time period she was employed at Hangsterfer's, Hudak accessed, retrieved and referred to certain confidential and proprietary information that she had copied from Fuchs without Fuchs' knowledge or authorization.

Dated: May 13, 2008

NANCY HUDAK

FUCHS LUBRICANTS CO.

By: /s/ David B. Ritter.
One of Her Attorneys

By: /s/ Daniel F. Lanciloti.
One of Its Attorneys

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